BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268–0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE OF RESPONSE TO INTERROGATORY OCA/USPS-67 (March 31, 2000)

The United States Postal Service hereby moves that it be permitted to file thirty-five days late its response to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-67, filed on February 15, 2000. The response was due to have been filed on February 25, 2000. The press of other discovery obligations contributed to the delay in the preparation of the response, but it is impossible to deny that greater diligence might have mitigated that delay to some degree. The Postal Service apologizes for the delay and defers to the OCA on the question of whether it has been prejudicial.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2998 Fax –5402 March 31, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Michael T. Tidwell

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